



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

9 September, 2019

Katrina Higgins-Coltrain
Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Remedial Branch (SEDRL)
1201 Elm Street, Suite 500
Dallas, Texas 75270-2102

RE: Pre-Final/Final Design Report, Revision 00, Wilcox Oil Company Remedial Design

Dear Mrs. Higgins-Coltrain,

The Department of Environmental Quality (DEQ) received an electronic copy of the Pre-Final/Final Design Report, Revision 00, for the Wilcox Oil Company Superfund Site, Bristow, Oklahoma on August 5th, 2019.

DEQ has completed its review of the above mentioned document and has the following comments:

1. Sec. 1.6, 2nd and 3rd paragraphs:
2nd paragraph implies that additional excavation will occur in tank waste areas, but not in lead area based on confirmation sampling data. The 3rd paragraph implies that visual screening is the basis for additional excavation. EPA and DEQ will determine visual observations, not owners on site representative or RA contractor.
2. Sec. 2.2, first paragraph, last sentence:
Replace "contract" with "contrast"
3. Sec. 2.2, last paragraph:
Is surveying and sampling of this area separate actions, or incorporated into the already planned confirmation sampling?
4. Sec. 2.3.1, last paragraph, last sentence:
"companies" should be "company's"
5. Sec. 2.3.2, last paragraph, second sentence:
There is a missing word here.
In the third sentence, "concentration" should be plural
6. Sec. 2.5.2, second paragraph:
The ARAR is still applicable correct? Through treatment, we should be able to meet the ARAR standard.
7. Sec 2.6.3:
The Source Control ROD indicates no O&M. Long term O&M should be associated with a final remedy for the site.



8. Sec 3.1.2, last paragraph:
Hasn't this work already been performed?
9. Sec 3.2.3: Same comment as #7
10. Sec. 3.2.3, first sentence:
There seems to be a missing word ("of") missing here
11. Appendix A:
Drawing C301 has two conflicting scales at the bottom right.

Please consider incorporating the above comments in a revised Design Report.
Feel free to contact me at (405) 702-5136 or todd.downham@deq.ok.gov with any questions or comments

Sincerely,

A handwritten signature in black ink that reads "W. Todd Downham". The signature is fluid and cursive, with a long horizontal stroke at the end.

Todd Downham
Environmental Programs Specialist
Department of Environmental Quality
Land Protection Division

Ec: Patrick Apple, EA